

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOHN F. PORTILLO, RAFAEL SUAREZ,	: Civ. Action No.: 15-cv-7908-JHR-KMW
MARTIN DURAN, GERMAN BENCOSME,	:
EDIN VARGAS, LUIS A. HERNANDEZ,	: <u>Document Electronically Filed</u>
JOSUE PAZ, and ALVARO CASTANEDA,	:
individually and behalf of all others similarly	: *Oral Argument Requested*
situated,	:
Plaintiffs,	:
v.	: Motion Day: December 7, 2020
NATIONAL FREIGHT, INC. and NFI	:
INTERACTIVE LOGISTICS, INC.,	:
Defendants.	:

TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, on December 7, 2020, or as soon as counsel may be heard, the undersigned attorneys for Plaintiffs will move this Court for an Order granting Plaintiffs' Motion to Bar Defendants from Asserting Retaliatory Counterclaims.

PLEASE TAKE FURTHER NOTICE that, in support of Plaintiffs' Motion to Motion to Bar Defendants from Asserting Retaliatory Counterclaims, Plaintiffs rely on the accompanying Memorandum of Law and its attached exhibits and the record and pleadings on file.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiffs respectfully request oral argument.

Dated: October 28, 2020

Respectfully submitted,
/s/ Camille Fundora Rodriguez

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CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2020, a true and correct copy of the foregoing document was served on all counsel of record electronically via CM/ECF.

/s/ Camille Fundora Rodriguez
Camille Fundora Rodriguez